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Filing date: **09/07/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91195609
Party	Plaintiff Minnesota Twins, LLC
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Submission	Motion to Suspend for Settlement Discussions
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Attachments	Motion on Consent Minnesota Wild 090712.pdf ( 3 pages )(18604 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Application Serial Nos. 77/813,908 and 77/813,912

Filed: August 27, 2009

For Mark: MINNESOTA WILD (Stylized)

Published in the Official Gazette: January 19, 2010

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MINNESOTA TWINS, LLC,

Opposer,

Opposition No. 91195609

v.

MINNESOTA WILD HOCKEY  
CLUB, L.P.,

Applicant.

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**MOTION ON CONSENT TO CONTINUE THE SUSPENSION OF PROCEEDINGS  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the above-captioned proceeding for a period of three (3) months, until **December 7, 2012**.

Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made towards a resolution in this matter. Since the last request for suspension, significant progress has been made towards a resolution in this matter. Opposer's in-house counsel and Applicant's outside counsel have had several discussions and most recently discussed, in detail, proposed terms of a settlement in this matter and other business and legal issues concerning the use and registration of the parties' respective marks. The additional time is

requested to allow both attorneys to reconvene with their respective clients, in light of the information that has come out of these negotiations, and for Applicant's outside counsel and her client to formulate possible counter-proposals for presentation to Opposer and for the parties to commit proposed terms to a draft agreement which, when finalized, would allow them to resolve this matter without the need to proceed with the Opposition.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six (6) months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial and other periods should be reset accordingly.

Dated: New York, New York  
September 7, 2012

Respectfully submitted,  
COWAN, LIEBOWITZ & LATMAN, P.C.  
*Attorneys for Opposer*

By                     /Seth Shaifer/                      
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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on September 7, 2012, I caused a true and complete copy of the foregoing *Motion On Consent To Continue the Suspension of the Proceedings And To Extend Discovery Period If Opposition Is Resumed* to be sent via First Class Mail, postage paid, to applicant's attorney, Mary J. Sotis, Esq., Frankfurt Kurnit Klein & Selz PC, 488 Madison Avenue, New York, New York 10022 and Applicant's Correspondent of Record, Thomas H. Prochnow, NHL Enterprises LP, 1185 Avenue of the Americas, New York, NY 10036-2601.

Dated: New York, New York  
September 7, 2012

/Seth Shaifer/  
Seth Shaifer